

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ROBERT JEFFERY KING,
Plaintiff,

v.

Case No: 1:18-cv-00503
Honorable: **PAUL L. MALONEY**
Magistrate: **PHILLIP J. GREEN**

Hillsdale City Manager DAVID MACKIE, in his individual and official capacity, Hillsdale Municipal Airport Managers JASON WALTERS, and GINGER ROSS MOORE in their individual and official capacity, Airport Advisory Committee Chairperson, ROY SZARFINSKI, in his individual and official capacity, Hillsdale City Councilperson, BRUCE SHARP, in his individual and official capacity, Defendants.

Nicholas H. Klaus (P81076)
KLAUS LAW PLLC LAW
Attorney for Plaintiff
520 S. Union Street
Traverse City, Michigan 49684
Voice: (313) 757-2052
Email: nicholas@klauslawpllc.com

Daniel P. Steele (P34295)
OFFICE OF DANIEL P. STEELE, PLLC
Attorney for Defendants Moore & Walters
33470 Lyndon, Suite 100
Livonia, Michigan 48154
Voice: (248) 830-6312
Facsimile: (734) 425-6553
Email: dan@dansteelelaw.com

Thomas L. Thompson (P48937)
LOVINGER & THOMPSON, P.C.
Attorneys for Defendants Mackie, Szarfinski, and Sharp
91 S. Broad Street, P.O. Box 358
Hillsdale, Michigan 49242
Voice: (517) 439-1421
Facsimile: (517) 439-9030
Email: tlthompsonsr@me.com

PLAINTIFF'S EXPERT WITNESS DISCLOSURE

NOW COMES Plaintiff, ROBERT JEFFERY KING, by and through his attorneys, Klaus Law P.L.L.C., and for his Expert Witness Disclosure states as follows:

1. Donald C Frank
Meridian Law Center, P.C.
2295 Sower Blvd
Okemos, MI. 48864

Liability expert. Mr. Frank has been practicing law for over 30 years, with a specialty in aviation law and regulations applicable to the operation of airports such as the Hillsdale Municipal Airport at issue in this matter. Mr. Frank is expected to testify as to the legality and irregularities of the operation of the Hillsdale County Airport, that Plaintiff brought to public light, and for which he was retaliated against.

Respectfully submitted,

KLAUS LAW P.L.L.C.

/s/ Nicholas H. Klaus
Nicholas H. Klaus (P81076)
520 S. Union Street
Traverse City, MI 49684
313-757-2052
nicholas@klauslawpllc.com

CERTIFICATE OF ELECTRONIC FILING AND SERVICE

I certify that on January 22, 2019, I electronically filed the foregoing PLAINTIFF'S EXPERT WITNESS DISCLOSURE with the Clerk of the Court using the ECF system which will send notification of such filing to counsel for the Defendants.

/s/ Nicholas H. Klaus

Nicholas H. Klaus

Attorney for Plaintiff

nicholas@klauslawpllc.com